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Attorney for Plaintiff
DONNA MATHEWS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DONNA MATHEWS,

Plaintiff,

vs.

PAN AMERICAN LIFE INSURANCE
COMPANY; and DOE 1 through Doe 20,
Inclusive,

Defendants.

No. C 07-02757 SBA

EX PARTE MOTION FOR
ADMINISTRATIVE RELIEF TO
PERMIT OPPOSITION
MEMORANDUM THAT EXCEEDS
PAGE LIMITATION;
DECLARATION OF MICHAEL E.
KINNEY; PROPOSED ORDER

TO THE HONORABLE SAUNDRA B. ARMSTRONG AND TO ALL PARTIES
AND THEIR ATTORNEYS OF RECORD:

Plaintiff is herewith e-filing her Opposition to Motion for Summary Judgment.
Hearing on the motion is set for June 10, 2008 at 1:00 p.m. before this Court.

Plaintiff's Opposition Memorandum is 33 pages in length, which exceeds the limit of
25 pages permitted by local rules. This Motion is being made to permit the Opposition to exceed

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1 the 25 page limit.

2 Dated: May 19, 2008

LAW OFFICE OF MICHAEL E. KINNEY

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4 By: /s/
5 Michael E. Kinney
6 Attorney for Plaintiff
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DECLARATION OF MICHAEL E. KINNEY

I, Michael E. Kinney, declare:

1. I am an attorney licensed to practice before this Court and the attorney of record for Plaintiff, Donna Mathews, herein.

2. I have prepared an Opposition to Defendant's Motion for Summary Judgment. That Opposition has been e-filed with this Court.

3. The Opposition Memorandum is 33 pages in length.

4. I tried to be as succinct as I could, but there were too many issues that needed to be addressed. I could not explain my client's opposition adequately in fewer pages.

5. Under the time pressure of preparing and submitting the Opposition, I did not realize that the Opposition Memorandum was exceeding the page limit until May 19, 2008. The Opposition is due on May 20, 2008.

6. On May 19, 2008, I spoke with Thomas Evans, opposing counsel. He indicated that he did not oppose this motion for administrative relief.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Dated this 19th day of May at Santa Rosa, California.

/s/ _____
Michael E. Kinney

MEMORANDUM OF POINTS AND AUTHORITIES

I.

**THE COURT HAS POWER TO GRANT THIS
MOTION FOR ADMINISTRATIVE RELIEF**

Local Rule 7-11 gives the Court the power to grant this motion.

Dated: May 19, 2008

LAW OFFICE OF MICHAEL E. KINNEY

By: /s/
Michael E. Kinney
Attorney for Plaintiff

ORDER

GOOD CAUSE therefore appearing, it is ordered that Plaintiff may file an Opposition Memorandum of 33 pages.

Dated: _____

Judge